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VIA ECF

April 16, 2025

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Charles v. Pinnacle Too, LLC et al
Case No. 1: 22-cv-04232 (JMF)(JEW)

Dear Judge Willis:

I am writing to you on behalf of (i) Agir Electrical Ltd., (ii) Pinnacle Too, LLC. and (iii) myself (Collectively, the "Pinnacle defendants") in connection with the Court's March 17, 2025 Order with respect to the Pinnacle defendants obtaining new counsel on or before April 18, 2025.

In connection with retaining new counsel, the Pinnacle defendants just learned that prior counsel was apparently unaware that Pinnacle Electric ESOP, an unnamed party, was the owner of Agir Electrical Ltd for the majority of time-period with respect to the allegations in the complaint.

Based upon the foregoing, the Pinnacle defendants respectfully request that the Court extend the deadline to obtain new counsel to May 19, 2025. The Pinnacle defendants are in the process of trying to gather documents with respect to Pinnacle Electrical ESOP ownership, etc. to review with potential new counsel.

Thank you for your consideration in this matter.

Very truly yours,

Antony M. Gironta

President

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